OhioEPA
State of Ohio Environmental Protection Agency

Southeast District Office

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Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Christopher Jones, Director

April 18, 2003

**Re:** Belmont County
Wheeling Pittsburgh Steel
Martins Ferry Plant
Compliance Evaluation Inspection
Correspondence (IWW)

Mr. Bud Smith
Wheeling Pittsburgh Steel Corp.
1134 Market Street
Wheeling, WV 26003

[redacted]

Dear Mr. Smith:

On April 8, 2003, Eric Nygaard and I, of Ohio EPA's Division of Surface Water, Compliance Evaluation Inspection (CEI) at the Wheeling Pittsburgh Steel Corporation Martins Ferry (WPS-MF) plant. Tom Waligura, Pat Smith, and Wayne Pysh represented the Wheeling Pittsburgh Corporation during the inspection.

The purpose of the inspection was to determine the facility's compliance status with the terms and conditions of the NPDES permit, Federal Number OH0011339, State Number OIC00020*CD. Wastewater samples were not collected. A copy of the inspection report form is attached.

Based on the evaluation of the facility, Wheeling Pittsburgh Steel Corporation Martins Ferry plant was found to be in marginal compliance with the permit on the day of the inspection due to NPDES permit effluent and Part III violations. The following comments/problems were noted as a result of the inspection:

1. The NPDES permit for WPS-MF expired on October 31, 1999. The company has applied for a permit renewal, and Ohio EPA is in the process of drafting the renewal permit. It is expected that the draft permit will be issued in the next 2 weeks. The expired permit remains in effect until the new permit is issued.

2. Since the last inspection (July, 2001) the following effluent violations have occurred. At outfall 001, the effluent limitation for zinc was exceeded on July 25, 2001. The hexavalent chromium limit was exceeded on December 17, 2002. Every effort must be made to comply with the effluent limits contained in the NPDES permit.

3. The process sewers in the plant are connected to a main sewer that also transports stormwater from the south end of the facility to the WWTP influent sump. In the past, during high storm flows, this combined process and storm flow has discharged without benefit of treatment over the sump weir wall, and when sampled this flow has been shown to be in violation of the NPDES permit limitations. The discharge of process related flows without treatment is a violation of Part III of the NPDES permit and must be ceased. Provide a plan for eliminating the possibility of discharge of process water without treatment.

4. WPS-MF is in violation of Part III, Section 11 of the NPDES Permit for the following unauthorized discharges:

   On July 25, 2001, a severe storm caused a bypass to occur over the weir wall for a total of 45 minutes, as influent to the sump/lift station exceeded the capacity of the pumps to pump all the flow to the treatment plant and the equalization (EQ) tank (0.61 inches total of rain/which fell in 45 minutes). The zinc concentration was tested to be 4300 ug/l (permit limit is 910 ug/l daily maximum).

5. In addition, WPS-MF is in non-compliance with Part III Item (12)(B)(2) for failing to measure the flow volume of bypassed flow. In the future, the results shall be reported to the Ohio EPA in accordance with Part III, Section 12 of the permit.

   WPS-MF must make every effort to prevent unauthorized discharges over the influent sump weir wall.

6. Sampling and measuring the flow actually discharged is not being performed as required by the NPDES permit. The flow reported is comprised of measured WWTP influent flow and water consumed in wastewater treatment. The flow that bypasses treatment when it flows over the sump weir is not measured and is sometimes of significant volume. This flow often contains high levels of zinc. It is not possible to determine compliance with the loading limits during a bypass event because the actual flow discharged is not measured. During a bypass event, the actual flow discharged is not sampled because the sampler only samples flow out of the WWTP. The NPDES permit requires the sample to be representative of the discharge. Therefore, WPS must revise the sampling and flow measurement at outfall 001 so that the actual final effluent is monitored and sampled.

7. On March 7, 2001, WPS-MF submitted a Permit to Install application for an additional flow equalization holding tank and pumping capacity to prevent bypasses of storm/process water from occurring at outfall 001. Revisions were requested on August 7, 2001. To date, no response has been received. Please provide an update of this PTI.

8. The results of DMRQA #22 testing indicates acceptable results for all parameters tested.

9. The WPS-MF bioassay reports (performed by ATEL for WPS) for outfall 001 since the last inspection indicate the following results:

   12/03/01 - 12/04/01 .... acutely toxic
   06/26/02 - 06/28/02 .... acutely toxic
   12/16/02 - 12/17/02 .... acutely toxic

10. Ohio EPA also conducted a bioassay at Wheeling Pittsburgh Steel's Martins Ferry plant on December 3-4, 2001. The results showed that the effluent at outfall 001 was acutely toxic.

11. Ohio EPA remains concerned about the level of zinc in the stormwater at your facility. However, no stormwater sampling results have been submitted since February 1, 1999. Routine stormwater sampling will be required in the renewed NPDES permit. Your Stormwater Management Plan does not address the sources of zinc contamination, nor does it provide for management of this stormwater to control zinc contamination. WPS must address the problem of zinc contaminated stormwater leaving the site. Submit a revised Stormwater Management Plan that identifies areas and sources of contamination and actions to be taken to reduce or eliminate contamination.

12. During the inspection, it was noted that a significant amount of oil and grease is present in the influent sump at the WWTP. This condition was commented on during the last inspection as a concern.

    A. On the day of the inspection, the oil skimming device was broken, which is a violation of Part III (3) of the NPDES permit. WPS staff were unable to commit to when repairs would be complete. Provide a date by when repairs will be completed.

    B. Ohio EPA believes that the skimmer system is not effective for adequate oil and grease removal from the influent sump. WPS must propose an adequate system for routine removal of oil and grease from the influent sump.

    C. Although a baffle system installed at the influent sump weir wall should inhibit release of oil and grease during low flows over the weir, oil and grease was released during the discharge that occurred as a result of the firefight at the WPS-MF store room fire on December 17, 2002. The report submitted by WPS-MF staff indicated the discharge contained oil spots, foam, and brown discoloration, which is a violation of Part III (2) of the NPDES permit.

    D. The discharge that occurred over the weir wall December 17, 2002, as a result of the fire fighting was not sampled nor was flow measurement taken, which was a violation of Part III(12) of the NPDES permit.

    E. When oil and grease grab samples are taken of flow over the weir wall, care must be taken to follow proper sampling procedures such as sampling the discharge with the final sample bottle (do not use a dipper and transfer the sample to the sample bottle).

13. Ohio EPA is concerned about the integrity of the +100 year old sewer line that carries acid and caustic process and contaminated stormwater from the plant to the WWTP influent sump. The condition of this sewer must be examined and repairs made, if necessary.

14. No progress has been made during negotiations between Ohio EPA, Ohio Attorney General's Office, U.S. EPA Region 5, and WPS towards resolving these problems at the WPS-MF plant since the last inspection of the facility.

The Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets and U.S. EPA's Facility Pollution Prevention Guide, (EPA/600/R-92/088), you may contact the Ohio EPA Pollution Prevention Section at (740) 644-3469 or me for additional information.

Please respond to comments 2-7 and 9-14 within 20 days of receipt of this notice. If you have any questions, please contact me at (740) 380-5284 at your convenience.

Sincerely,

Ms. Abbot Stevenson
Environmental Engineer
Permits and Enforcement Section
Division of Surface Water

AS/dh

Enclosure

c: Bill Landshof, DSW, CO
c: Gregory A. Poulos, Attorney General's Office
c: AS file

# NPDES Compliance Inspection Report

## A. NATIONAL DATA SYSTEM CODING

| Permit No. | NPDES No. | Date | Inspection Type | Inspector | Facility Type |
|---|---|---|---|---|---|
| OIC00020*CD | OH0011339 | April 8, 2003 | E | S | 2 |

## B. FACILITY DATA

| Name and Location of Facility Inspected | Entry Time | Permit Effective Date |
|---|---|---|
| Wheeling Pittsburgh Steel Corporation<br>Martins Ferry Plant<br>1001 Main Street<br>Martins Ferry, Ohio 43935 | 9:30 a.m. | November 1, 1995 |
| | **Exit Time** | **Permit Expiration Date** |
| | 1:00 p.m. | October 31, 1999 |

| Name(s) and Title(s) of On-Site Representative(s) | Phone Number(s) |
|---|---|
| Wayne Pysh, Environmental Coordinator<br>Tom Waligura, Manager, Environmental Control | (740) 283-5663<br>(304) 234-2682 |
| **Name, Address and Title of Responsible Official** | **Phone Number** |
| Bud Smith<br>Wheeling Pittsburgh Steel Corporation<br>1134 Market Street<br>Wheeling, WV 26003 | (304) 234-2662 |

## C. AREAS EVALUATED DURING INSPECTION

| | | | | | |
|---|---|---|---|---|---|
| M | Permit | U | Flow Measurement | N | Pretreatment |
| S | Records/Reports | N | Laboratory | S | Compliance Schedules |
| M | Operations & Maintenance | M | Effluent/Receiving Waters | S | Self-Monitoring Program |
| S | Facility Site Review | S | Sludge Storage/Disposal | N | Other |
| N | Collection System | | | | |

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

## D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

1. Permit - See attached letter Item #3, 4, 5, 12
2. O&M - See attached letter Item #12
3. Flow measurement - See attached letter Item #6
4. Effluent - See attached letter Item #2

**Abbot Stevenson**, Inspector, Ohio EPA, Southeast District Office — Date 4/18/03

**Ryszard Lecznar**, Reviewer, Ohio EPA, Southeast District Office — Date 4/18/03

Sections E through K: Complete on all inspections as appropriate (N/A = Not Applicable N/E = Not Evaluated)

## E. PERMIT VERIFICATION

| Inspection Observations Verify the Permit | Yes | No | N/A | N/E |
|---|---|---|---|---|
| a. Correct name and mailing address of permittee | X | | | |
| b. Correct name and location of receiving waters | X | | | |
| c. Product(s) and production rates conform with permit application (industries) | X | | | |
| d. Flows and loadings conform with NPDES permit | X | | | |
| e. Treatment processes are as described in permit application/briefing memo | X | | | |
| f. New treatment process(es) added since last inspection | | X | | |
| g. Notification given to state of new, different, or increased discharges | | | X | |
| h. All discharges are permitted* | | X | | |
| i. Number and location of discharge points are as described in permit* | | X | | |

**Comments:** *See Item #4 in letter.

## F. COMPLIANCE SCHEDULES/VIOLATIONS

| | Yes | No | N/A | N/E |
|---|---|---|---|---|
| a. Any significant violations since the last inspection | X | | | |
| b. Permittee is taking actions to resolve violations* | | X | | |
| c. Permittee has compliance schedule | | X | | |
| d. Compliance schedule contained in ___ | | | X | |
| e. Permittee is meeting compliance schedule | | | X | |

**Comments:** *No action taken since PTI application was submitted in 2001.

## G. OPERATION AND MAINTENANCE

| Treatment Facility Properly Operated and Maintained | Yes | No | N/A | N/E |
|---|---|---|---|---|
| a. Standby power available: Generator ___ Dual Feed ___ | | X | | |
| b. Adequate alarm system available for power or equipment failures* | X | | | |
| c. All treatment units in service other than backup units | X | | | |
| d. Sufficient operating staff provided: # of shifts 3 Days/Week 7 | X | | | |
| e. Operator holds unexpired license of class required by permit Class: ___ | | | X | |
| f. Routine and preventive maintenance schedule/performed on time** | | X | | |
| g. Any major equipment breakdown since last inspection | | X | | |
| h. Operation and maintenance manual provided and maintained | X | | | |
| i. Any plant bypasses since last inspection*** | X | | | |
| j. Regulatory agency notified of bypasses ___ on MORS ___ 800 Number (SEDO) | X | | | |
| k. Any hydraulic and/or organic overloads experienced since last inspection**** | X | | | |

**Comments:** *24 hour staffing
**Maintenance of influent sump oil and grease removal inadequate
***2 occurrences since last inspection (July, 2001)
****Hydraulic overloads during some rains

**Collection System:**

| | Yes | No | N/A | N/E |
|---|---|---|---|---|
| a. Percent combined system: ___% | | | X | |
| b. Any collection system overflows since last inspection (CSO ___ SSO ___) | | | | |
| c. Regulatory agency notified of overflow (SSOs) | | | | |
| d. CSO O and M plan provided and implemented | | | | |
| e. CSOs monitored and reported in accordance with permit | | | | |
| f. Portable pumps used to relieve system | | | | |
| g. Lift station alarm systems provided and maintained | | | | |
| h. Are lift stations equipped with permanent standby power or equivalent | | | | |
| i. Is there an inflow/infiltration problem (separate sewer system), or were there any major repairs to collection system since last inspection | | | | |
| j. Any complaints received since last inspection of basement flooding | | | | |
| k. Are any portions of the sewer system at or near capacity | | | | |

## H. SLUDGE MANAGEMENT

a. Sludge Management Plan (SMP): _____ Submitted Date
_____ Approval Number
_____ Not submitted
__X__ N/A

| | Yes | No | N/A | N/E |
|---|---|---|---|---|
| b. Sludge Management Plan current | | | X | |
| c. Sludge adequately disposed (Method: Landfill ) | X | | | |
| d. If sludge is incinerated, where is ash disposed of? _____ | | | | |
| e. Is sludge disposal contracted (Name: USA Waste ) | X | | | |
| f. Has amount of sludge generated changed significantly since last inspection | | X | | |
| g. Adequate sludge storage provided at plant | X | | | |
| h. Land application sites monitored and inspected per SMP | | | X | |
| i. Records kept in accordance with state and federal law | | | | X |
| j. Any complaints received in last year regarding sludge | | X | | |
| k. Is sludge adequately processed (digestion, dewatering, pathogen control) | | | X | |

# I. SELF-MONITORING PROGRAM

## Part 1 - Flow Measurement

| | Yes | No | N/A | N/E |
|---|---|---|---|---|
| a. Primary flow measuring device properly operated & maintained. Type of device:<br>_____ ultrasonic & parshall flume __X__ calculated from influent<br>_____ weir _____ Other (Specify:_____)<br>_____ ultrasonic & weir | X | | | |
| b. Calibration frequency adequate (date of last calibration 06/14/01 ) | X | | | |
| c. Secondary instruments (totalizers, recorders etc.) properly operated and maintained | X | | | |
| d. Flow measurement equipment adequate to handle expected ranges of flows | X | | | |
| e. Actual flow discharged is measured* | | X | | |
| f. Flow measuring equipment inspection frequency: __X__ Daily _____ Weekly _____ Monthly _____ Other | | | | |

**Comments:** *Actual flow discharged is not measured. See Items 5 and 6 in letter.

## Part 2 - Sampling

| | Yes | No | N/A | N/E |
|---|---|---|---|---|
| a. Sampling location(s) are as specified by permit* | | X | | |
| b. Parameters and sampling frequency agree with permit | X | | | |
| c. Permittee uses required sampling method | X | | | |
| d. Sample collection procedures are adequate* | | X | | |
| i. Samples refrigerated during compositing | X | | | |
| ii. Proper preservation techniques used | X | | | |
| Conform with 40 CFR 136.3 | X | | | |
| e. Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records) | X | | | |
| f. Adequate records maintained of sampling date, time, exact location, etc. | X | | | |

**Comments:** * Samples are to be taken at final discharge point.
** Procedures are not adequate when discharge occurs over the weir wall because the samples are not representative of the discharge.

## Part 3 - Laboratory

| General | Yes | No | N/A | N/E |
|---|---|---|---|---|
| a. EPA approved analytical testing procedures used (40 CFR 136.3) | X | | | |
| b. If alternate analytical procedures are used, proper approval has been obtained | | | X | |
| c. Analyses being performed more frequently than required by permit | | X | | |
| d. If (c) is yes, are results reported in permittee's self-monitoring report | | | X | |
| e. Commercial laboratory used<br>1. Parameters analyzed by commercial lab: All except pH, flow, and rainfall<br>2. Lab name: Antech, Ltd. | X | | | |

| Quality Control/Quality Assurance | Yes | No | N/A | N/E |
|---|---|---|---|---|
| f. Quality assurance manual provided and maintained | | | X | |
| g. Satisfactory calibration and maintenance of instruments and equipment | X | | | |
| h. Adequate records maintained | X | | | |
| i. Results of latest U.S. EPA quality assurance performance sampling program:* | | | | |

Date: 12/02 (#22)

X Satisfactory
_____ Marginal
_____ Unsatisfactory

**Comments:** *Lead and oil & grease were unacceptable.

## J. EFFLUENT/RECEIVING WATER OBSERVATIONS

| Outfall # | Oil Sheen | Grease | Turbidity | Visible Foam | Visible Float Solids | Color | Other |
|---|---|---|---|---|---|---|---|
| 001 | None | None | Clear | Some foam | None | Colorless | |

## K. MULTIMEDIA OBSERVATIONS

| | Yes | No | N/A | N/E |
|---|---|---|---|---|
| a. Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories* | X | | | |
| b. Do you notice staining or discoloration of soils, pavement, or floors | | X | | |
| c. Do you notice distressed (unhealthy, discolored, dead) vegetation | | X | | |
| d. Do you see unidentified dark smoke or dustclouds coming from sources | | X | | |
| e. Do you notice any unusual odors or strong chemical smells | | X | | |
| f. Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities | | X | | |

**If any of the above are observed, ask the following questions:**

1. What is the cause of the conditions?
2. Is the observed condition or source a waste product?
3. Where is the suspected contaminant normally disposed?
4. Is this disposal permitted?
5. How long has the condition existed and when did it begin?

**Comments:** * Significant amounts of oil & grease are reaching the wastewater treatment plant. Used flux tanks are stockpiled outside near the WWTP without secondary containment.